## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

STEVEN E. NOTHERN,	)
Plaintiff,	)
VS.	) CIVIL ACTION NO. 07-10661-NMG
UNITED STATES DEPARTMENT OF THE TREASURY,	) ) )
Defendant.	) ) _)

## JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR ATTORNEYS' FEES AND COSTS

Pursuant to Fed. R. Civ. P. 6(b) and 54(d), plaintiff Steven E. Nothern and defendant U.S. Department of the Treasury hereby move to extend the time in which the plaintiff may file his motion for attorneys' fees and costs under 5 U.S.C. § 552(a)(4)(E) to and including Thursday, January 10, 2008. As grounds for the motion, the parties state that the requested extension will allow them to pursue settlement of the amount of fees during the winter holiday period, potentially obviating judicial determination of a fee award.

The parties certify that they have conferred and agreed upon this joint motion. No memorandum of law is submitted in support because there are no disputed issues of fact or law and the relief requested is within the discretion of the Court.

WHEREFORE, the parties jointly request that the deadline for plaintiff to file his motion for attorneys' fees and costs be extended to Thursday, January 10, 2008.

Respectfully submitted,

FOR THE PLAINTIFF:

FOR THE DEFENDANT:

/s/ John A. Shope

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Dated: December 14, 2007

/s/ Paul G. Freeborne

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